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United States District Court  
Northern District of Illinois

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)  
Plaintiff - Ashley Jordan

v.

)  
)  
)  
)  
Defendant  
Honeywell FM & T

COMPLAINT

**RECEIVED**

NOV 01 2019

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

1:19-cv-07220

Judge Sara L. Ellis

Magistrate Judge Sidney I. Schenkier

See Attachment.

I filed a discrimination & retaliation complaint against **Honeywell Federal Manufacturing & Technologies** with the EEOC and notified OFCCP. I served as a Senior Human Resource Generalist from July 2017 until April 2018. During my employment, I was subjected to discrimination, retaliation, and harassment due to my race, origin, and refusing to support violations of EEOC, USERRA, NLRA, FMLA, FLSA and other related laws. In January 2018, I received a Performance Improvement Plan after I reported unfair treatment, sexual harassment, and failed to support a discipline that wrongfully accused an African American Male employee (Bill Burgess) for theft in the cafeteria.

I received office supplies in poor condition, did not receive the same training, and access to HR systems as my White HR Generalist coworkers. My Manager told me that I could not have a business cell phone but my other coworkers received a cell. However, I supported unionized populations and third shift workers. I also was taken off projects that leaders (i.e. **Amy Tills, Senior Human Director & Randy White, Chief Technology Officer**) invited me on. I endured several racist and micro-aggression comments made by Manager & coworkers (**Lindsey Cummings & Nicole McParlan**). Lindsey Cummings later apologized for offensive comments and communicated that she did not receive a PIP. This further confirmed that I received wrongful performance review. My Manager (**Katelynn Paul, Senior HR Manager**) added to my workload and directed me to oversee Lindsey's client group (AME) because she was unresponsive and had several absences due to a personal problem. I took on additional responsibilities and received thank you notes from AME business leaders and Lindsey Cummings. However, my manager never said thank you or good job on anything.

**Nicole McParlan** apologized for making comments that made me and my colleagues feel uncomfortable. She wanted the HR Suite to be a safe space to talk freely about anything. I apologized too because my intent was not to restrict her from speaking freely but only bringing awareness that it may offend some people. I thought it was extremely important to call this out to her because she had some complaints from her client group reporting similar concerns. We had a private conversation and then moved forward in good standing.

My manager (**Katelynn Paul**) asked me why I only ate with Black employees, which was a prejudice assumption. I ate with all employees. I met with her, other team members for lunch, or dinner after work. My Manager called me a northerner and an elitist. I believe because I came from Corporate HR and an Upper Midwestern.

Regarding my PIP, I was told that I met my results but did not meet Honeywell Behaviors, which was newly rolled out and subjective. Many of the managers did not know how to evaluate employees using the new behaviors. There was inconsistent communications around the new HON behaviors. I also communicated that the HR Department was underperforming. FM&T Human Resources had the highest turnover rate at the site. Furthermore, I noticed the Performance Management Process in place adversely impacted African Americans associates, other People of Color, Women and older White Men. These employees are evaluated more harshly. **Rashawnda Walker (African American, Woman)** received a poor performance review (5 to 8 rating) with no justification or documentation of conversation leading to PIP written by her manager. She received an award nominated by her manager's boss. I did not support this PIP. I also challenged a decision and got it overturned when my manager tried to compensate an hourly associate (**Bruce Johns, White Man**) hired to a salaried position at a much lower rate than salaried employee hired to that position with same experience and education level. My business leaders brought this to my attention and I presented a business case to our compensation



leader. Shortly after, I was retaliated against and she blocked hiring for my Quality division which impacted our ability to meet some business goals. It impacted Steve Condron's group.

I reported these incidents to Human Resources and there was never a follow-up with me and no improvements in my experience. I requested a transfer to another Honeywell site on the Commercial side of the business and was told I had to stay at least 18 months. FM&T culture was extremely hostile and the leaders support workplace bullying. My coworkers witnessed and is aware of the unfair treatment that I received. I had a business leader (Rick Vanhooze, White Man) slams his fist on my desk and threw a stapler at me.

Toby "Frank" Johnson (African American, Man) reported that money was being deducted from his pay check. I conducted an investigation and learned that several employees were getting money deducted due to overpayment without any notice. There were several payroll issues and once I caught them I made team members correct the errors. I later found out that these members received good performance ratings at a 5 or better. However, they made several critical errors that negatively impacted our employees pay and major compliance issues. Some of these errors were due to HR failing to provide proper information, which I pointed out in a meeting. I'm a strong advocate for self, team, and leadership accountability.

There are many cases I reported when we were in violations or did not handle a situation appropriately. There were cases managers tried to give an employee random drug screenings without establishing reasonable suspicion. I protected leaders from committing discrimination or setting a bad practice.

Patricia Wilson (White Woman), reported age discrimination and other forms of unfair treatment. She requested to take a demotion to leave her division. She wanted to transfer to my division. I learned about this incident and reported it to Sarah Zillox, Senior HR Manager.

#### Unfair Performance Evaluations

One group of employees receives pay for no work while other employees worked and are evaluated through a 9 block Performance Management Program. I was told non-working employees are watching movies and playing cards because they did not have a security clearance so there is no work for them to do. In succession planning, more Whites were being promoted than non-whites to upper management. In fact, upper management is not racially diverse at all and many employees complained about unequal treatment and access to leadership roles.

#### Racially Charged Environment

Many employees reported racial harassments and JR, President at FM & T conducted a town hall meeting with all employees to discuss these incidents and to remind them that our Business code conduct will be enforced to maintain hostile-free environment. There are many forms of harassment, discrimination, and retaliation happening at this site. It needs to stop and there should be some leadership accountability.

I was afraid to speak out because I received death threats, strange phone calls, and I was told that I will no longer have a career in my field. I was unwell after this traumatic experience and suffered from severe situational depression and anxiety.



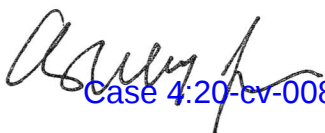


I referenced our policies, mission, and values to guide my decision making. I also had the words of Dave Cote, Former CEO on my wall, which said,

"Acting with integrity protects the Honeywell brand. Our Reputation, and our brand mean everything to us. Employees want to feel good about the company they work for. From the shop floor to the boardroom, all of us associated with Honeywell want to be proud of our company and hold our heads up high in our communities. Getting everybody **committed to the highest standards for integrity and compliance** ensures that every employee gets to feel this sense of pride. This directly translates into positive perceptions of how others view us. **Honeywell has zero tolerance for employees who do not conduct business according to the law.** When we identify irregularities, we deal with them swiftly! In fact, we have referred employees who have committed wrongdoing to law enforcement, regardless of the potential embarrassment to us as a company anywhere in the world."

Many incidents led to this wrongful termination and violation of my civil rights. This termination creates an inaccurate portrayal of my work ethic, values, and character. Honeywell FM&T continues to provide negative referrals to potential employers.

I interviewed with several companies and specifically had hiring manager strongly recommend that I apply to a HR position, which I did. I had a hiring manager tell me that she really want me on her team but extended no offer. She alluded to Honeywell being the reason for not moving forward with an offer. I had interviewers make comments leading me to believe that Honeywell FM & T is committing defamation. Furthermore, I had professional associates contact me to apply for roles and then go unresponsive. For that reason and more, I believe ongoing retaliation is happening.



## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

## DISMISSAL AND NOTICE OF RIGHTS

To: **Ashley Jordan**  
**1256 West 97th Place**  
**Chicago, IL 60643**

From: **Chicago District Office**  
**230 S. Dearborn**  
**Suite 1866**  
**Chicago, IL 60604**



On behalf of person(s) aggrieved whose identity is  
 CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

440-2019-04195

**Sergio Maldonado,**  
**Investigator**

(312) 872-9729

## THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a **claim** under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as **defined** by the Americans With Disabilities Act.



The Respondent employs less than the **required** number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of **the** statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any **other** issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the **state** or local fair employment practices agency that investigated this charge.



Other (briefly state)

## - NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

**Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act:** This will be the **only** notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under **federal** law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under **state** law may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in **federal** or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

**Julianne Bowman,**  
**District Director**

Enclosures(s)

8/29/19  
 (Date Mailed)

cc: **HONEYWELL FM&T**  
**c/o John Ricciardelli**  
**President**  
**14520 Botts Road**  
**Kansas City, MO 64147**

**CHARGE OF DISCRIMINATION**

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA☒ EEOC**440-2019-04195****Kansas City, MO - Human Relations Department**

and EEOC

State or local Agency, if any

Name (indicate Mr., Ms., Mrs.)

**Ashley Jordan**

Home Phone (Incl. Area Code)

**(952) 484-2178**

Date of Birth

**1988**

Street Address

City, State and ZIP Code

**1256 West 97th Place, Chicago, IL 60643**

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

**HONEYWELL FM&T**

No. Employees, Members

**500 or More**

Phone No. (Include Area Code)

**(816) 488-2000**

Street Address

City, State and ZIP Code

**14520 Botts Road, Kansas City, MO 64147**

Name

No. Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

☒ RACE ☐ COLOR ☐ SEX ☐ RELIGION ☐ NATIONAL ORIGIN  
☒ RETALIATION ☐ AGE ☐ DISABILITY ☐ GENETIC INFORMATION  
☐ OTHER (Specify)

DATE(S) DISCRIMINATION TOOK PLACE  
Earliest Latest**08-16-2019**☒ CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)).

I began my employment with Respondent on or about July 17, 2017. My most recent position was Senior HR Generalist. During my employment, I was subjected to sexual harassment and racial discrimination. Furthermore, I led workplace investigations for my business units and reported adverse impact toward people of color and I tried enforcing the business code of conduct and the other related State and Federal Laws ( EEOC, FLSA, FMLA, etc..) . I was also subjected to harassment and micro aggression. I complained to Respondent to no avail. Subsequently, I was discharged. Respondent continues to provide negative referrals to potential employers.

I believe I am being discriminated against because of my race, Black, and in retaliation for engaging in protected activity, in violation of Title VII of the Civil Rights Act of 1964, as amended.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(month, day, year)

X

8-16-2019

X

Ashley Jordan

Date

Charging Party Signature



# FILING SUIT IN COURT OF COMPETENT JURISDICTION

## PRIVATE SUIT RIGHTS

The issuance of this *Notice of Right to Sue* or *Dismissal and Notice of Rights* ends the EEOC process with respect to your Charge. You may file a lawsuit against the Respondent within 90 days from the date you receive this Notice. Therefore, you should keep a record of the date. Once the 90 day period is over, your right to sue is lost. If you intend to consult an attorney, you should do so as soon as possible. Furthermore, in order to avoid any question that you did not act in a timely manner, if you intend to sue on your own behalf, your suit should be filed well in advance of the expiration of the 90 day period.

You may file your lawsuit in a court of competent jurisdiction. Filing this Notice is not sufficient. A court complaint must contain a short Statement of the facts of your case which shows that you are entitled to relief. Generally, suits are brought in the State where the alleged unlawful practice occurred, but in some cases can be brought where relevant employment records are kept, where the employment would have been, or where the Respondent has its main office.

You may contact the EEOC if you have any questions about your rights, including advice on which court can hear your case, or if you need to inspect and copy information contained in the case file.

IF THE FIRST THREE CHARACTERS OF YOUR EEOC CHARGE NUMBER ARE "21B" AND YOUR CHARGE WAS INVESTIGATED BY THE ILLINOIS DEPARTMENT OF HUMAN RIGHTS (IDHR), REQUEST FOR REVIEWING AND COPYING DOCUMENTS FROM YOUR FILE MUST BE DIRECTED TO IDHR.

A lawsuit against a private employer is generally filed in the U.S. District Court.

A lawsuit under Title VII of the Civil Rights Act of 1964, as amended, against a State agency or a political subdivision of the State is also generally filed in the U.S. District Court.

However, a lawsuit under the Age Discrimination in Employment of the American with Disabilities Act or, probably, the Equal Pay Act against a State instrumentality (an agency directly funded and controlled by the State) can only be filed in a State court.

A lawsuit under the Age Discrimination in Employment Act or the American with Disabilities Act or the Equal Pay Act against a political subdivision of a State, such as municipalities and counties, may be filed in the U.S. District Court.

For a list of the U.S. District Courts, please see the reverse side.

## ATTORNEY REPRESENTATION

If you cannot afford an attorney, or have been unable to obtain an attorney to represent you, the court having jurisdiction in your case may assist you in obtaining a lawyer. If you plan to ask the court to help you obtain a lawyer, you must make this request of the court in the form and manner it requires. Your request to the court should be made well in advance of the 90 day period mentioned above. A request for representation does not relieve you of the obligation to file a lawsuit within the 90-day period.

## DESTRUCTION OF FILE

If you file suit, you or your attorney should forward a copy of your court complaint to this office. Your file will then be preserved. Unless you have notified us that you have filed suit, your Charge file could be destroyed as early as six months after the date of the Notice of Right to Sue.

IF YOU FILE SUIT, YOU OR YOUR ATTORNEY SHOULD NOTIFY THIS OFFICE WHEN THE LAWSUIT IS RESOLVED.



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION  
Chicago District Office

JCK Federal Building  
230 S. Dearborn  
Suite 1866 (Enforcement, State and Local & Hearings)  
Suite 2920 (Legal & ADR)  
Chicago, IL 60604  
Intake Information Group: (800) 669-4000  
Intake Information Group TTY: (800) 669-6820  
Chicago Direct Dial: (312) 872-9777  
Administration Fax: (312) 588-1255  
Enforcement/File Disclosure Fax: (312) 588-1260  
Federal Sector Fax: (312) 588-1265  
Intake Fax: (312) 588-1286  
Legal Fax: (312) 588-1494  
Mediation Fax: (312) 588-1498  
Website: [www.eeoc.gov](http://www.eeoc.gov)

## NOTICE OF DISCLOSURE RIGHTS

Parties to an EEOC charge are entitled to review and obtain copies of documents contained in their investigative file. Requests must be made in writing to **Sylvia Bustos** and either mailed to the address above, faxed to (312) 588-1260 or sent via email to [sylvia.bustos@eeoc.gov](mailto:sylvia.bustos@eeoc.gov) (please choose only one method, no duplicate requests). Be sure to include your name, address, phone number and EEOC charge number with your request.

If you are the Charging Party and a RIGHT TO SUE has been issued, you may be granted access to your file:

- \* Before filing a lawsuit, but within 90 days of your receipt of the Right to Sue, or
- \* After your lawsuit has been filed. If more than 90 days have elapsed since your receipt of the Right to Sue, include with your request a copy of the entire court complaint (with court stamped docket number) or enough pages to determine whether it was filed based on the EEOC charge.

If you are the Respondent you may be granted access to the file only after a lawsuit has been filed. Include with your request a copy of the entire court complaint that includes an official court stamped docket number.

Pursuant to federal statutes, certain documents, such as those which reflect the agency's deliberative process, will not be disclosed to either party.

You must sign an Agreement of Nondisclosure before you are granted access to the file, which will be sent to you after receipt of your written request. (Statutes enforced by the EEOC prohibit the agency from making investigative information public.)

The process for access to the file will begin no later than ten (10) days following receipt of your request.

When the file becomes available for review, you will be contacted. You may review the file in our offices and/or request that a copy of the file be sent to you. Files may not be removed from the office.

Your file will be copied by Aloha Print Group. You are responsible for the copying costs and must sign an agreement to pay these costs before the file will be sent to the copy service. Therefore, it is recommended that you first review your file to determine what documents, if any, you want copied. EEOC will not review your file or provide a count of the pages contained in it. If you choose not to review your file, it will be sent in its entirety to the copy service, and you will be responsible for the cost. Payment must be made directly to Aloha Print Group, which charges 15 cents per page.

(Revised 05/20/19, previous copies obsolete)